

## ***REMARKS***

This is a full and timely response to the outstanding non-final Office Action mailed March 28, 2008. Claims 1-24 remain pending in the present application. Reconsideration and allowance of the application and pending claims are respectfully requested.

### **1. Response to Rejections of Claims under 35 U.S.C. § 101**

Claims 18-24 have been rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Claims 18-24 have been amended to address the Examiner's concerns. Withdrawal of the rejections is respectfully requested.

### **2. Response to Objection of Claims**

Claim 16 has been objected to under 37 CFR 1.75(c) as allegedly being in improper form. The claim has been amended to address the Examiner's concerns. Withdrawal of the objection is respectfully requested.

### **3. Response to Rejections of Claims under 35 U.S.C. § 103**

Claims 1-24 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Li* (U.S. Patent No. 6,345,279) in view of *Kraus* (U.S. Patent No. 6,266,684).

#### **a. Claim 1**

As provided in claim 1, Applicants claim:

A method of authoring a document to be served for rendering on a plurality of classes of devices comprising:

defining at least two choices of content which may be styled for a first content portion of the document;

defining at least two choices of content which may be styled for a second content portion of the document; and

*labelling the choices of content for a web page to indicate to a server approved combinations of content for the first content portion of the web page with content for the second content portion of the same web page, wherein the web page is produced for serving to a requesting user by incorporating an approved*

***combination of content for the first content portion of the web page and the second content portion of the same web page.***

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Li* in view of *Kraus* does not disclose, teach, or suggest all of the claimed features above, such as “labelling the choices of content for a web page to indicate to a server approved combinations of content for the first content portion of the web page with content for the second content portion of the same web page, wherein the web page is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the web page and the second content portion of the same web page.”

For example, *Li* describes a method of adapting multimedia content to a client device. In particular, *Li* describes transcoding multimedia content into a plurality of transcoded content versions, where the plurality of transcoded content versions have different modalities and resolutions associated therewith, allocating at least a portion of the resources associated with the client device among the one or more items of the multimedia content, and selecting one or more of the transcoded versions of the multimedia content to generate customized content based on allocation of the client device resources. As such, *Li* does not disclose that a combination of content for a first content portion and a second content portion of a web page are defined and labeled. For example, *Li* does not disclose that choices of content are labeled to indicate, as an example, that a particular version of a video file in a first portion of a document should be combined with a particular version of an audio file in a second portion of the document.

In contrast, the claimed subject matter describes a document having a first content portion and a second content portion. For the first content portion, at least two choices of content (e.g., A and B) are defined which may be styled for the first content portion. Likewise, for the second content portion, at least two choices of content (e.g., X and Y) are defined which may be styled for the second content portion. Therefore, for a requesting device, an approved combination (e.g., (A, X); (A, Y); (B, X); (B, Y)) of content for the first portion and the second portion is served to the requesting device when the document or web page is produced.

For at least these reasons, *Li* fails to teach or suggest at least “labelling the choices of content for a web page to indicate to a server approved combinations of content for the first content portion of the web page with content for the second content portion of the same web page, wherein the web page is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the web page and the second content portion of the same web page,” as recited in claim 1.

Further, *Kraus* describes a web page authoring program that presents a graphical display which facilitates the creation of a multiple frame web page. Using the web page authoring program, *Kraus* discloses that text labels may be added to a web page to describe an associated hyperlink or URL. See col. 2, lines 56-61. Unlike the claimed subject matter, *Kraus* does not describe a combination of content for a first content portion and a second content portion of a web page being defined and labeled. For at least these reasons, *Kraus* individually or in combination with *Li* fails to teach or suggest at least “labelling the choices of content for a web page to indicate to a server approved combinations of content for the first content portion of the web page with content for the second content portion of the same web page, wherein the web page is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the web page and the second content portion of the same web page,” as recited in claim 1.

As a result, claim 1 is patentable over *Li* in view of *Kraus*, and the rejection of claim 1 should be withdrawn.

b. Claims 2-17

Dependent claims 2-17 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that the dependent claims contain all the features of allowable independent claim 1. See *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Additionally and notwithstanding the foregoing allowability of claims 2-17, these dependent claims recite further features and/or combinations of features (as is

apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why these dependent claims are allowable.

c. Claim 18

As provided in claim 18, Applicants claim:

A system for authoring a document to be served for rendering on a plurality of classes of devices comprising:

***a content defining tool for defining at least two choices of content which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the document;***

***a labelling tool which permits an author to label the choices of content to indicate to a server allowable combinations of content for the first content portion with content for the second content portion of the same document,*** and

processing circuitry configured to execute the content defining tool and the labeling tool,

wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document.

Applicants respectfully submit that independent claim 18 is allowable for at least the reason that *Li* in view of *Kraus* does not disclose, teach, or suggest at least all of the claimed features above, such as “a content defining tool for defining at least two choices of content which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the document [and] a labelling tool which permits an author to label the choices of content to indicate to a server allowable combinations of content for the first content portion with content for the second content portion of the same document.”

For example, *Li* describes a method of adapting multimedia content to a client device. In particular, *Li* describes transcoding the multimedia content into a plurality of transcoded content versions, where the plurality of transcoded content versions have different modalities and resolutions associated therewith, allocating at least a portion of the resources associated with the client device among the one or more items of the multimedia content, and selecting one or more of the transcoded versions of the multimedia content to generate customized content based on allocation of the client

device resources. As such, *Li* does not disclose that a combination of content for a first content portion and a second content portion of a web page are defined and labeled. For example, *Li* does not disclose that choices of content are labeled to indicate, as an example, that a particular version of a video file in a first portion of a document should be combined with a particular version of an audio file in a second portion of the document.

In contrast, the claimed subject matter describes a document having a first content portion and a second content portion. For the first content portion, at least two choices of content (e.g., A and B) are defined which may be styled for the first content portion. Likewise, for the second content portion, at least two choices of content (e.g., X and Y) are defined which may be styled for the second content portion. Therefore, for a requesting device, an approved combination (e.g., (A, X); (A, Y); (B, X); (B, Y)) of content for the first portion and the second portion is served to the requesting device when the document or web page is produced.

For at least these reasons, *Li* fails to teach or suggest at least “a content defining tool for defining at least two choices of content which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the document [and] a labelling tool which permits an author to label the choices of content to indicate to a server allowable combinations of content for the first content portion with content for the second content portion of the same document,” as recited in claim 18.

Further, *Kraus* describes a web page authoring program that presents a graphical display which facilitates the creation of a multiple frame web page. Using the web page authoring program, *Kraus* discloses that text labels may be added to a web page to describe an associated hyperlink or URL. See col. 2, lines 56-61. Unlike the claimed subject matter, *Kraus* does not describe a combination of content for a first content portion and a second content portion of a web page being defined and labeled. For at least these reasons, *Kraus* individually or in combination with *Li* fails to teach or suggest at least “a content defining tool for defining at least two choices of content which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the document [and] a

labelling tool which permits an author to label the choices of content to indicate to a server allowable combinations of content for the first content portion with content for the second content portion of the same document," as recited in claim 18.

For at least these reasons, claim 18 is patentable over *Li* in view of *Kraus*, and the rejection of claim 18 should be withdrawn.

d. Claims 19-22

Dependent claim 19 (which depends from independent claim 18) is allowable as a matter of law for at least the reason that the dependent claim contains all the features of allowable independent claim 18. See *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Additionally and notwithstanding the foregoing allowability of claim 19, the dependent claims recites further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why the dependent claim is allowable.

e. Claim 23

As provided in claim 23, Applicants claim:

A computer readable storage medium storing a computer program for processing to produce a rendered document, the program comprising:

***a content defining section defining at least two choices of content for the document, which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the same document; and***

***a label section which includes labels corresponding to choices of content, each label indicating to a server an allowable combination of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document.***

Applicants respectfully submit that independent claim 23 is allowable for at least the reason that *Li* in view of *Kraus* does not disclose, teach, or suggest at least all of the

claimed features above, such as “a content defining section defining at least two choices of content for the document, which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the same document [and] a label section which includes labels corresponding to choices of content, each label indicating to a server an allowable combination of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document.”

For example, *Li* describes a method of adapting multimedia content to a client device. In particular, *Li* describes transcoding the multimedia content into a plurality of transcoded content versions, where the plurality of transcoded content versions have different modalities and resolutions associated therewith, allocating at least a portion of the resources associated with the client device among the one or more items of the multimedia content, and selecting one or more of the transcoded versions of the multimedia content to generate customized content based on allocation of the client device resources. As such, *Li* does not disclose that a combination of content for a first content portion and a second content portion of a web page are defined and labeled. For example, *Li* does not disclose that choices of content are labeled to indicate, as an example, that a particular version of a video file in a first portion of a document should be combined with a particular version of an audio file in a second portion of the document.

In contrast, the claimed subject matter describes a document having a first content portion and a second content portion. For the first content portion, at least two choices of content (e.g., A and B) are defined which may be styled for the first content portion. Likewise, for the second content portion, at least two choices of content (e.g., X and Y) are defined which may be styled for the second content portion. Therefore, for a requesting device, an approved combination (e.g., (A, X); (A, Y); (B, X); (B, Y)) of content for the first portion and the second portion is served to the requesting device when the document or web page is produced.

For at least these reasons, *Li* fails to teach or suggest at least “a content defining section defining at least two choices of content for the document, which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the same document [and] a label section which includes labels corresponding to choices of content, each label indicating to a server an allowable combination of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document,” as recited in claim 23.

Further, *Kraus* describes a web page authoring program that presents a graphical display which facilitates the creation of a multiple frame web page. Using the web page authoring program, *Kraus* discloses that text labels may be added to a web page to describe an associated hyperlink or URL. See col. 2, lines 56-61. Unlike the claimed subject matter, *Kraus* does not describe a combination of content for a first content portion and a second content portion of a web page being defined and labeled. For at least these reasons, *Kraus* individually or in combination with *Li* fails to teach or suggest at least “a content defining section defining at least two choices of content for the document, which may be styled, for a first content portion of the document and at least two choices of content, which may be styled, for a second content portion of the same document [and] a label section which includes labels corresponding to choices of content, each label indicating to a server an allowable combination of content for the first content portion with content for the second content portion of the same document, wherein the document is produced for serving to a requesting user by incorporating an approved combination of content for the first content portion of the document and the second content portion of the same document,” as recited in claim 23.

For at least these reasons, claim 23 is patentable over *Li* in view of *Kraus*, and the rejection of claim 23 should be withdrawn.

f. Claim 24

Dependent claim 24 (which depends from independent claim 23) is allowable as a matter of law for at least the reason that the dependent claim contains all the features of allowable independent claim 23. See *In re Fine*, 5 U.S.P.Q.2d 1596, 1600 (Fed. Cir. 1988).

Additionally and notwithstanding the foregoing allowability of claim 24, the dependent claims recites further features and/or combinations of features (as is apparent by examination of the claim itself) that are patentably distinct from the cited art of record. Hence, there are other reasons why the dependent claim is allowable.

**CONCLUSION**

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

  
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